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10-110
LAW OFFICE OF LEIGHTON K. LEE
LEIGHTON K. LEE-2975
222 Merchant Street, Suite 201
Tel. No.: (808) 531-3244
Facsimile No.: (808) 531-3247
E-mail: leighton@hawaiiilaw.org

And

JONES DAY
BRIAN D. HERSHMAN, ESQ. (Pro Hac Vice)
555 South Flower Street, Fiftieth Floor
Los Angeles, CA 90071
Telephone: (213) 489-3939
Facsimile: (213) 243-2539
bhershman@jonesday.com

Attorneys for Defendant
KENNETH CHIO HENG IONG

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

MAR 14 2007 *Ag*
at 2 o'clock and 39 min. P.M.
SUE LETHA, CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiffs,

vs.

KENNETH CHIO HENG IONG,

Defendant.

CR No. 05-00117-01-HG

DEFENDANT'S NOTICE OF
MOTION AND MOTION TO
CONTINUE SENTENCING
HEARING; MEMORANDUM OF
POINTS AND AUTHORITIES;
DECLARATION OF BRIAN D.
HERSHMAN; CERTIFICATE OF
SERVICE

Date:

Time:

Judge: Honorable Helen Gillmor

Sentencing Date: June 7, 2007

**DEFENDANT'S NOTICE OF HEARING OF DEFENDANT'S MOTION TO
CONTINUE SENTENCING**

TO: LESLIE E. OSBORNE, JR., ESQ.
 Assistant United States Attorney
 EDWARD H. KUBO, JR., ESQ.
 United States Attorney
 Room 6100, PJKK Federal Building
 300 Ala Moana Boulevard, Box 50183
 Honolulu, Hawai'i 96850

PLEASE TAKE NOTICE that Defendant Kenneth Chio Heng Iong will, and hereby does, bring a Motion to Continue the Sentencing currently scheduled for June 7, 2007 before this Court in the courtroom of the Honorable Helen Gillmor, United States District Judge, United States Courthouse, 300 Ala Moana Boulevard, Room C338, Honolulu, Hawaii 96850 on:

_____, 2007 at _____.m. , or as soon thereafter as counsel can be heard.


MOTION

Defendant Kenneth Chio Heng Iong respectfully moves for an Order continuing the sentencing currently scheduled for June 7, 2007 to September 13, 2007, or a date thereafter convenient to the Court. As discussed in the accompanying Memorandum of Points and Authorities, defendant formally

retained new counsel on or about February 23, 2007 in connection with his agreement to plead guilty to Counts 3 and 11 of the Indictment. At the same time, defendant retained a forensic accounting expert to analyze the financial information provided by the government, including defendant's tax returns, to determine the actual tax loss to the government and defendant's outstanding tax liability.

In order to allow new counsel and defendant's retained expert to review the voluminous financial documents, analyze the relevant information and allow defendant the time necessary to secure resources to pay back any outstanding tax liability, defendant requests that the sentencing be continued in the interests of justice to September 13, 2007, or a date thereafter convenient to the Court.

DATED: 3/14/07, Honolulu, Hawaii JONES DAY

By: 
Brian D. Hershman
Attorney for Defendant,
Kenneth Chio Heng Iong